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Attorney for Plaintiff Gerasimos Molfetas

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

**IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION**

Civil Action No. 4:13-md-02420-YGR
MDL No. 2420

**STATEMENT IN SUPPORT OF
APPOINTMENT OF COTCHETT,
PITRE & McCARTHY, LLP AND
LIEFF CABRASER HEIMANN &
BERNSTEIN AS CO-LEAD
COUNSEL FOR INDIRECT
PURCHASERS**

This Document Relates to:

Indirect Purchaser Plaintiffs

Date: April 3, 2013
Time: 2:00 p.m.
Judge: Hon. Yvonne Gonzalez Rogers
Ctm: 5, 2nd Floor

**STATEMENT IN SUPPORT OF APPOINTMENT OF COTCHETT, PITRE & McCARTHY, LLP
AND LIEFF CABRASER HEIMANN & BERNSTEIN AS CO-LEAD COUNSEL FOR INDIRECT
PURCHASERS, Case No. 13-md-24240-YGR**

Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure and this Court's order of March 4, 2013 (Dkt. No. 8), Plaintiff Gerasimos Molfetas and his counsel Pomerantz Grossman Hufford Dahlstrom & Gross LLP support the Motion for an Order Appointing Cotchett, Pitre & McCarthy, LLP ("CPM") and Lieff Cabraser Heimann & Bernstein, LLP ("Lieff") as co-lead and trial counsel for the putative indirect purchaser class.

We believe that the leadership of CPM and Lieff would greatly benefit the class. We have previously worked with both firms, and are aware of and respect CPM and Lieff's prior experience in this type of litigation, and believe their many years of extensive antitrust and complex litigation experience make them the most appropriate choice to serve as interim co-lead counsel on behalf of the proposed class. Most important, both CPM and Lieff have a proven ability to lead and *try* complex cases successfully.

The attorneys of Pomerantz Grossman Hufford Dahlstrom & Gross LLP have over a hundred years of experience in complex civil litigation. We believe that we could work effectively with CPM and Lieff in this case.

DATED: March 28, 2013

**Pomerantz Grossman
Hufford Dahlstrom & Gross LLP**

/s/ Jayne A. Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filings to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM-ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 28, 2013.

/s/ Jayne Arnold Goldstein
Jayne A. Goldstein